

Eagleton, Naomi

Eagleton, Naomi on 7/11/2014 (8:6-8:12)

- 6 Q. And it's not a question I usually ask young
7 ladies, but how old are you?
8 A. 83.
9 Q. 83. And do you remember your date of birth?
10 A. October the 15th, 1930.
11 Q. Okay. And can you tell me, were you born and
12 raised in -- in Houston?

Eagleton, Naomi on 7/11/2014 (22:5-22:8)

- 5 Q. And prior to walking to the polling place,
6 did you have any understanding that you could vote by
7 mail?
8 A. Yeah. I knew it.

Eagleton, Naomi on 7/11/2014 (47:23-48:2)

- 23 Q. (BY MS. WOLF) And do you have any siblings,
24 any brothers or sisters?
25 A. I have one brother living.

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- 1 Q. Okay. And is he older or younger than you?
2 A. He's older than me.

Eagleton, Naomi on 7/11/2014 (49:23-50:8)

- 23 Q. Do you currently have your current voter
24 registration card?
25 A. Yeah. But I don't know where I put it. I

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- 1 got it, though.
2 Q. But it's in your house somewhere?
3 A. Uh-huh. I keep them.
4 Q. Okay. And I think you had said you had gone
5 to a couple of different schools. Do you have any
6 records or transcript from those schools?
7 A. Well, I'm sure they have transcripts from --
8 I finished from Wheatley.

Eagleton, Naomi on 7/11/2014 (61:25-62:9)

- 25 Q. And then finally, I think you said you also

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- 1 go to the HEB sometimes?
2 A. Yeah. That one is in Spring, I think.
3 Q. And about how long does that take you on the
4 bus?
5 A. It'll take about -- after I get out of
6 town -- it -- it'll take about two hours to get out
7 there.
8 Q. And that's one way?
9 A. Uh-huh.

Eagleton, Naomi on 7/11/2014 (63:5-63:21)

EXHIBIT

DEF 2766

Eagleton, Naomi

5 Q. And I think you had said when we were off the
6 record, you have some grandchildren?

7 A. So many of them.

8 Q. How -- how many do you have?

9 A. I got about 35, I know.

10 MR. GEAR: Wow.

11 A. Great grands and all like that.

12 Q. (BY MS. WOLF) Okay.

13 A. Yeah.

14 Q. And do any of them -- are any of them old
15 enough to drive?

16 A. Yeah.

17 Q. Okay. And do you -- do your grandchildren or
18 great grandchildren or children, do they ever give you
19 rides anywhere?

20 A. Oh, yeah. They'll come -- I got one lives in
21 Baytown -- I mean, in Beaumont.

Eagleton, Naomi on 7/11/2014 (65:10-65:15)

10 Q. When you -- when you rode on --

11 A. They always taking me somewhere, now. We go
12 to Louisiana, San Antonio. Everywhere they go,
13 grandma got to go.

14 Q. So they drive you there?

15 A. Yeah.

Eagleton, Naomi on 7/11/2014 (76:18-77:2)

18 Q. Did you read this document at all when you
19 were -- when it was given to you?

20 A. Huh-uh. I didn't read it. I just figured,
21 well, I done voted. It's all over with. You know,
22 like, always when I go there.

23 Q. And you didn't read any of the documents that
24 they gave you?

25 A. Huh-uh. I didn't read them.

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1 Q. But sitting here today, did you --

2 A. But I will read from now on.

Eagleton, Naomi on 7/11/2014 (86:11-86:15)

11 Q. Do you know that it's free to replace your
12 social security card?

13 MR. GEAR: Objection; assumes facts not
14 in evidence.

15 A. No, I didn't know that.

Eagleton, Naomi on 7/11/2014 (89:23-89:24)

23 Q. Do you have a Medicare card?

24 A. Yeah. I got one.

Eagleton, Naomi on 7/11/2014 (94:2-94:10)

2 Q. Okay. If you take a look at Exhibit 3, I'd
3 ask you just to look at the second page of this
4 document. Do you see there that it says it's from --
5 from your address to the address that's listed on
6 here, which is 11039 East Freeway, that it's 3.8 miles

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7 distance?

8 MR. GEAR: Objection; relevance.

9 Objection; vague.

10 A. No. I didn't hear your question.

Eagleton, Naomi on 7/11/2014 (94:16-96:3)

16 Q. (BY MS. WOLF) If you just take a look at

17 Exhibit 3, the second page, you see up in the top

18 left-hand corner?

19 A. Uh-huh.

20 Q. Do you see where it says 3.8 miles?

21 A. Uh-huh.

22 Q. Okay. Is 3.8 miles a distance that you've

23 gotten rides for before?

24 A. That -- that I've rode through there?

25 Q. That you've had rides. Not on the bus

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1 necessarily, but had rides?

2 A. Oh, I'm not too much at these maps.

3 Q. Well, you don't even have to look at the

4 maps. We can do it without the map. Has -- have you

5 ever gotten a ride from your children or grandchildren

6 for more than four miles?

7 A. Oh, yeah.

8 Q. And during the week?

9 A. On the weekend.

10 Q. Okay. But also during the week as well or

11 just on the weekend?

12 A. During the week and on the weekend.

13 Q. And if you take a look at the first page of

14 the Exhibit 2, you'll see that this -- this says it

15 takes an hour and 30 minutes on the bus. Do you see

16 that up in the top left-hand corner?

17 MR. GEAR: Same objection.

18 You can answer.

19 A. It's in the left-hand corner?

20 Q. (BY MS. WOLF) Yeah. The top left-hand

21 corner.

22 A. It's like I say, I'm not peculiar -- I'm not

23 good at them map reading.

24 Q. That's okay. Has an hour and 30 -- I think

25 you've already testified, but you've taken bus rides

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1 that are an hour or longer to get to the store; is

2 that correct?

3 A. Right.

Eagleton, Naomi on 7/11/2014 (99:17-99:22)

17 Q. When is the last time you received a voter

18 registration card?

19 A. I got one this year.

20 Q. So you got it in -- would that be in

21 December?

Eagleton, Naomi

22 A. I don't know. But I did get one this year.

Eagleton, Naomi on 7/11/2014 (100:9-100:16)

9 Q. And when you -- when you got the voter
10 registration card, did you read both sides of the
11 document?

12 A. No. I just look on the side where -- where
13 they have your name and get to the poll.

14 Q. So you didn't read the second side of the
15 document?

16 A. Huh-uh.

Eagleton, Naomi on 7/11/2014 (100:25-101:19)

25 Q. So you didn't see anything on the document

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1 which listed --

2 A. Only thing I looked at was my name was on
3 there and everything.

4 Q. So you didn't see anything on the document
5 which listed the forms of photo identification you
6 would need in order to vote?

7 A. Huh-uh.

8 Q. Okay. Do you have any plans to look at
9 that --

10 A. I do --

11 Q. -- voter registration card?

12 A. Uh-huh.

13 Q. Before you vote the next time?

14 A. I will.

15 Q. Both sides?

16 A. Both sides. Okay. That's just like when
17 you're driving. I'm sure it tickle me. You think
18 you're going down the right street, and you're going
19 down the wrong street.

Eagleton, Naomi on 7/11/2014 (110:12-110:19)

12 Q. Okay. And do you think that requiring a
13 voter to show a picture ID when they arrive at the
14 poll, that that will stop voter fraud?

15 MR. GEAR: Objection; relevance, vague,
16 calls for speculation.

17 A. You think if they show -- yeah. Because they
18 know you, you know. If you show them your ID. They
19 know if that's you or whoever that is.

Eagleton, Naomi on 7/11/2014 (112:6-112:9)

6 Q. So would you say that the majority of the
7 assistance that you get is how to work the voting
8 machine?

9 A. Uh-huh.

Eagleton, Naomi on 7/11/2014 (112:20-113:3)

20 Q. Have you ever seen a vote-by-mail ballot?

21 A. Uh-huh. I told you they sent me one before
22 the election.

23 Q. So the -- did it have everybody's -- all the

Eagleton, Naomi

24 candidates' names on it?

25 A. Huh-uh. They just send you a ballot, and you

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1 vote either whatever party you are.

2 Q. Okay.

3 A. I guess.

Eagleton, Naomi on 7/11/2014 (113:24-114:5)

24 Are there people that you think could help

25 you fill out a paper ballot?

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1 A. Well, if I wanted to fill out one, my kids

2 know how to do that.

3 Q. Okay.

4 A. They didn't go to school for nothing now.

5 They vote.

Eagleton, Naomi on 7/11/2014 (122:8-123:3)

8 papers --

9 A. Come up missing.

10 Q. -- burnt up in the flames?

11 A. Uh-huh. Things that I had put away, you

12 know, like pictures of my kids when they were born and

13 things, and how do you call it? Birth certificates

14 and stuff like that.

15 Q. So since that date, more than ten years ago,

16 have you had a birth certificate?

17 A. No.

18 Q. Have you had a social security --

19 A. They got it. They got it. They went -- when

20 I told them where they were born, then they went --

21 you know how youth is. They're going to tend to

22 business. They went on and got their birth

23 certificate.

24 Q. When you say "they," you're talking about

25 your children?

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1 A. I'm talking about the boys.

2 Q. The children?

3 A. Yeah, the children.